

REPLY BRIEF

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants: Taira Hanaoka et al.

Examiner: Jeffrey D. Carlson

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For: PORTABLE INFORMATION
TERMINAL APPARATUS AND
INFORMATION PROVISION METHOD

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REPLY BRIEF

Sir:

Appellant respectfully submits this Reply Brief in response to the Examiner's Answer dated December 1, 2006.

REPLY TO EXAMINER'S ARGUMENT

(A) References Do Not Suggest Creating or Using Bookmarks

The Examiner and Appellants agree that Schena does not teach an image stored in memory and displayed as a bookmark. However, the Examiner argues that Schena provides desire for a collection of collected, sorted and locally stored links to website content that would motivate one of ordinary skill to manage this collection of links in the manner notoriously known as bookmarks, so that Schena *suggests* "a bookmark image". Appellants disagree.

The definition of bookmark provided by the Examiner is "a link to a Web page or other URL that *a user has stored in a local file in order to return to it later.*" Schena does not suggest

storing links in a local file in order to return to it later. Instead, Schena discloses a method for managing a domain name service in which the link information and user input information are sent to a portal server (column 2, lines 25-38). While Schena discloses that “[t]he receiver 180 may, but not necessarily, collect, sort and prioritize the transmissions of link and user input information” (column 10, lines 43-47), the link and user input information may only be temporarily stored, and is not accessible by the user, whether it is temporarily stored, or at a later time. Instead, Schena stores the links along with user input information on a portal server. The user can later play a multimedia information sequence stored on his receiver, not view a web page whose link is stored on his receiver. The user cannot access a file and select a link and view the contents of the Web page associated with this link, and Schena does not teach or suggest that he or she can. Thus Schena does not teach the display of a bookmark.

To manage data as bookmarks based on Schena one would have to change the teachings of Schena by first, storing only a portion of the data that Schena stores, second, storing this portion of data in a local file, and third, enabling a user to access this local file to view the contents of a web page instead of viewing a multimedia information sequence supplied by a server. The Examiner provides no motivation in Schena to cause one skilled in the art to manage data as bookmarks.

Thus one of ordinary skill in the art would not be motivated to manage the collection of links of Schena in the manner of a bookmark because Schena collects more than merely a link to a web page, and Schena’s collection of links provides access to multimedia information not to a web page. In addition, Schena does not allow user access to the collection of links locally, and specifically does not allow a user to return to access the collection of links later. Therefore Schena does not suggest creating or using bookmarks.

(B) Dougherty Does Not Teach Associating Images with Web Links for Display

The Examiner contends that Dougherty provides an important teaching that multicon linkmarks can serve as machine-readable links to website content as well as can include visual elements that help a human user understand what content to expect at each link's destination. The Examiner concludes that, based on this teaching, one skilled in the art would find it obvious to include images/icons with the displayed collection of bookmarked links of Schena, an otherwise textual-based list of URLs. Appellants disagree.

As shown above, Schena does not teach a "displayed collection of bookmarked links". As discussed above, Schena teaches a collection of links and user information which is not displayed, but is sent to a portal server. Thus, appellants submit that there is no "displayed collection of bookmarked links" wherein images or icons could be included. Further, Dougherty teaches an invention which "improves the human/computer interface by providing printable interfaces that enable a user to invoke and control computer processes" (column 2, lines 53-55, emphasis added). Dougherty only discloses placing the Linkmarks on printed matter; no teaching or suggestion is made to display Linkmarks as a bookmark. Instead, the Linkmarks direct the computer system to a web page or web site (column 9, lines 52-53) which could be displayed (column 9, lines 59-60). Thus the hypothetical combination of Schena and Dougherty would not result in an apparatus or a method that reads and stores an image from printed matter, the image displayed on a display element as a bookmark image associated with access destination information, as recited in independent claims 1 and 6.

(C) Conclusion

Based on the above arguments and remarks, Appellants respectfully submit that the claims of the instant invention on appeal are not anticipated or obvious in light of Schena and Dougherty, either individually or in combination. Consequently, the rejections of the claims based on such references are in error. In view of the remarks submitted hereinabove and in Appellant's Appeal Brief, the references applied against Claims 1 and 3-14 on appeal do not render those claims unpatentable under 35 U.S.C. § 103(a). Thus, Appellants submit that the §103 rejections are in error and must be reversed.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment in connection herewith to Deposit Account No. 19-1013/SSMP.

Respectfully submitted,



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